

JEFFREY A. DICKERSON
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Attorney for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

JOE and MARY ZEITCHICK,

CASE NO. 3:06-cv-0138-ECR-VPC
BASE FILE
Case No. 3:06-cv-00642
MEMBER FILE

Plaintiffs,

vs.

AMENDED ATTORNEY'S LIEN

NEVADA SYSTEM OF HIGHER
EDUCATION, d.b.a. Western Nevada
Community College, CAROL LUCEY,
HELAINE JESSE, DAVID ROLLINGS,
WESTERN NEVADA COMMUNITY
COLLEGE FOUNDATION, and DOES
I-X,

Defendants.

Mr. Dickerson hereby asserts a special or charging lien on the judgment or settlement pursuant to NRS 18.015(1), *Morse v. District Court*, 65 Nev. 275, 281, 195 P.2d 199, 202 (1948), including a lien on any "claim, demand or cause of action, including any claim for unliquidated damages," upon which this suit was instituted by Mr. Dickerson. *Id.* Mr. Dickerson seeks an agreed upon contingency fee of 40% or in the alternative a reasonable fee for services the attorney has rendered for the client on account of the suit, claim, demand or action, and such lien attaches to any "verdict, judgment, or decree entered and any money or property which is recovered on account of the suit or other action," in the sum of NINETY EIGHT THOUSAND TWO HUNDRED EIGHTY DOLLARS AND 00/100 (\$98,280.00). NRS 18.015(1). Please note that the Nevada Supreme Court has held that this lien takes priority over medical provider liens and hospital liens and is not subject to distribution on a pro rata

1 basis. *Michel v. District Court*, 117 Nev. 145, 150, 17 P.3d 1003, 1006 (2001).

2 This lien is perfected pursuant to NRS 18.015(2) by serving notice in writing on the
3 client and on the party against whom the client has a cause of action, which has been
4 accomplished, claiming the lien and stating the interest which the attorney has in any cause
5 of action. Thereupon it is perfected. This lien is in addition to any retaining lien upon the
6 papers, books, documents, securities and money that the attorney obtained during the course
7 of his professional employment without any special contract regarding it. *Figliuzzi v. District*
8 *Court*, 111 Nev. 338, 343-44, 890 P.2d 798, 802 (1995); *Morse, supra*.

9 DATED July 14, 2009

10 LAW OFFICE OF
11 JEFFREY A. DICKERSON

12 /S/
JEFFREY A. DICKERSON

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Jeffrey A. Dickerson, Esq.
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CERTIFICATE OF MAILING

Pursuant to FRCP 5(b) I certify that I electronically filed the preceding document with the Clerk of the Court which will send a notice of electronic filing to

Mark Ghan

And further on the 14th day of July, 2009, I deposited for mailing, first class postage prepaid, a correct copy of the foregoing document addressed as follows:

Joe & Mary Zeitchick
1894 Hwy 50 East #4-253
Carson City, NV 89701

/S/ Kimberly D. Dawley
Signature

Jeffrey A. Dickerson, Esq.
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